

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

(1) DEBORAH L. LAWSON,  
Individually and on behalf of others similarly  
situated,

Plaintiff,

vs.

(1) PROCARE CRS, INC., dba PRO-CARE  
COMMUNITY RESIDENTIAL SERVICES,  
INC., a Domestic For Profit Business Corp.,

Defendant.

Case No. 18-CV-00248-TCK-JFJ

**JOINT MOTION FOR LEAVE TO FILE PLEADING UNDER SEAL**

Plaintiff Deborah Lawson, on behalf of herself and other individuals who executed Consents to Join to opt-in and become party plaintiffs in this action, Queshnia Ackerson, Karissa Allen Mills, Tonia Corbett, Diana Demery, Gwenella Hall, Rhonda Hall, Courtney Harvel, Summer Holcum, Crystal Lopez, Charity Mahone, Ronald Pozek, Kevin Risley, Ashton Williams, and Patsy Yandell (collectively referred to as “Employees”), and Defendant Pro-Care Community Residential Services, Inc., dba ProCare CRS (“ProCare”), pursuant to Local Civil Rule 79.1, respectfully move this Court for leave to file the parties’ Joint Motion for Approval of Settlement Agreement and Dismissal with Prejudice under seal. In support of this Motion, the parties state as follows:

1. Plaintiff Lawson initiated this lawsuit on May 8, 2018, alleging ProCare violated the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* (“FLSA”) and Okla. Stat. tit. 40, §§ 165.1, *et seq.*, and seeking unpaid overtime compensation, liquidated damages, and attorneys’ fees and costs. [Docket No. 2]. On May 10, 2018, the other Employees executed Consents to Join to opt-in and become party plaintiffs against ProCare in this case, and to be bound by any settlement in this action, and filed a First Notice of Filing of Consents to Join Action. [Docket No. 4].

2. Counsel for the parties have agreed to the terms of a proposed Confidential Settlement Agreement and Full and Final Release of Claims (the “Settlement Agreement”). Although no motion for certification was filed in this case, the terms of the Settlement Agreement were reached with all the individuals who opted into this action.

3. Because the FLSA requires that the Court approve any proposed settlement of claims, the parties have prepared a Joint Motion for Approval of Settlement Agreement and Dismissal with Prejudice, which includes the proposed Settlement Agreement and billing records as attachments. These documents contain financial and other terms that are sensitive and confidential, the disclosure of which would undermine the confidential terms of the proposed Settlement Agreement itself.

4. Accordingly, the parties’ interest in the confidentiality of the terms of their proposed Settlement Agreement, and the judicial interest in avoiding the unnecessary expenditure of time and resources in upholding the parties’ good faith and reasonable resolution of their dispute, outweigh the interest in public disclosure of the terms of the parties’ settlement.

WHEREFORE, , for the foregoing reasons, the parties respectfully request that the Court permit the parties to file under seal their Joint Motion for Approval of Settlement Agreement and Dismissal with Prejudice and the proposed Settlement Agreement.

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/S/ Terry A. Hall, with permission

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